

## PRIVACY POLICY

Thank you for visiting our website. Please read this Privacy Policy carefully as you shall be agreeing to these documents by using our website (hereafter referred as “site”) and related services.

### INTRODUCTION

Your privacy is very important to Atlas Travel & Technology Group, Inc. (collectively referred to in this document as “ATTG”, “we”, “our”, or “us”) and the following brands or related corporate businesses (Atlas Travel Global Travel Management, Atlas Travel Meeting & Incentive, Atlas Travel Vacation and Cruise, Atlas Travel & Technology LTD., and Prime Numbers Technology). All ATTG companies process personal data to some degree. We wish to inform you about this clearly and transparently. ATTG has created this Privacy Policy to demonstrate its firm commitment to privacy and security. While this policy is intended to describe the broadest range of our information processing activities globally in relation to the activities under the Site, those processing activities may be more limited in some jurisdictions based on the restrictions of their laws.

### DEFINITIONS

Throughout this Privacy Policy, we may use certain words or phrases, and it is important that you understand the meaning of them. The following is a non-exhaustive list of definitions of words and phrases found herein:

“Personal Data” refers to data that directly or indirectly identify you. Examples are your name and (e-mail) address and/or other contact details which can be used to identify you personally.

“Processing” refers to any acts that can be performed in relation to personal data. These may include collection, but also storage, use and removal of your personal data from our records.

“Service” refers to the services that we provide through this Site, including our Site itself.

“Site” refers to our website, [www.atlastravelandtechnology.com](http://www.atlastravelandtechnology.com) including all directly related websites.

“User” refers to you and anyone who uses our Service, including contest participants, and general visitors to our Site.

“You” refers to you, the person who is governed by this Privacy Policy.

### TYPES OF PERSONAL DATA WE COLLECT AND PROCESS

We collect certain Personal Data from you when you use our Site and/or sign up to our Service that can be used to identify you, such as your name, e-mail address, mailing address, and any other (non-sensitive) Personal Data that we deem necessary for the purpose of providing you with our Service or which you provide to us voluntarily.

Sensitive data are special types of Personal Data, for example concerning physical health, racial or ethnic data. We will Process sensitive data only if so required by law, with your consent or at your request. If you decide to disclose such data yourself, we will only process them if that is necessary for the Service.

ATTG collects information in different ways from individuals who access the various parts of our services and the network of Internet sites accessible through or utilized by our services and our company. We use this information primarily to provide the services to you that you are requesting and may also use it to provide a customized experience as you use our services and share such information

with third parties as described herein. Your personal information collected is disclosed if: (i) necessary for the provision of our services; (ii) we have received your permission beforehand; (iii) we specifically state that we will; or (iv) if such disclosure is required by law.

You may be asked to provide certain personal information when you use our services and/or sites, such as name, address, telephone number, billing information (such as a credit card number), and travel plans or arrangements. Unless expressly stated otherwise, the personal information collected is used for the provision of our services and is shared among ATTG and its related companies, affiliates, subsidiaries, partners, subcontractors, and agents, the global distribution systems (GDS), industry reporting authorities, and travel and related suppliers as necessary for the services provided. However, in instances in which ATTG and a partner jointly promote or offer the services, ATTG may provide the partner certain personal information for the sole purpose of allowing us and the partner to assess the results of the promotion or to offer the services. In this instance, personal information may not be used by the partner for any other purpose. ATTG may also generate non-personal identifying and aggregate profiles from personal information. We may use this aggregated and non-personal identifying information to sell advertisements that appear on the services or to enhance the services.

ATTG and its related companies, affiliates, and subsidiaries also receive personal information from their employees which may be shared and transferred in accordance with this Privacy Policy and ATTG's Human Resources Information. In addition, ATTG and its related companies, affiliates, and subsidiaries may receive personal information from job applicants which may be shared and transferred in accordance with this Privacy Policy.

ATTG occasionally hires other companies to provide limited services on our behalf, such as for fulfillment, survey, statistical analysis, or background and credit check purposes. Such companies will be permitted to obtain only the personal information they need to deliver the service. They are required to maintain the confidentiality of the information and are prohibited from using it for any other purpose.

Personal information collected on ATTG Internet sites and services may be stored and processed in the United States or any other country in which ATTG or its related companies, affiliates, subsidiaries, partners, subcontractors, or agents maintain facilities, and by using an ATTG Internet site or service, you consent to any such transfer of personal information outside of your country with the understanding that the laws surrounding personal information may vary between jurisdictions.

ATTG may be acquired, merge with another business, acquire, or buy other businesses or assets. In such transactions, personal information is generally one of the transferred business assets. In such an event, both personal and non-personal identifying information will be part of the transferred assets.

### Responses to Email Inquiries

When individuals send email inquiries to ATTG, the return email address is used to answer the email inquiry we receive. ATTG does not use the return email address for any other purpose and does not share the return email address with any third party.

### Voluntary Customer Surveys

ATTG may periodically conduct both business and individual customer surveys. We encourage our customers to participate in these surveys because they provide us with important information that helps us to improve the types of services we offer and how we provide them to you. Your personal information and responses will remain confidential, even if the survey is conducted by a third party.

Participation in our customer surveys is voluntary. We take the information we receive from individuals responding to our customer surveys and combine (or aggregate) it with the responses of other ATTG customers to create broader, generic responses to the survey questions (such as gender, age, residence, hobbies, education, employment, industry sector, or other demographic information). We then use the aggregated information to improve the quality of our services to you and to develop new services and products. This aggregated, non-personal identifying information may be shared with third parties.

## Age

This site is not directed to children under 13 years of age and ATTG does not knowingly collect personal information from children. Children under 13 years of age should not use this site to submit any personal information about themselves.

## **PROCESSING OF YOUR PERSONAL DATA**

It is ATTG's policy not to use or share the personal information about individuals in ways unrelated to the ones described above without also providing you an opportunity to opt out or otherwise prohibit such unrelated uses. However, ATTG may disclose personal information about individuals or information regarding your use of the services or Internet sites accessible through our services, for any reason if, in our sole discretion, we believe that it is reasonable to do so, including: (i) to satisfy laws, such as the Electronic Communications Privacy Act, regulations, or governmental or legal requests for such information; (ii) if we believe that it is necessary to identify, contact, or bring legal action against someone who may be violating our terms of use or other policies; (iii) to operate the services properly; or (iv) to protect ATTG and our customers. We treat the personal information we receive about individuals through our site in accordance with this Privacy Policy, whatever their Do Not Track setting. You may choose not to provide any or all of the personal information that is requested and/or refuse cookies in your browser (please refer to the "Cookies" clause in Section 1, Notice, of this Privacy Policy), however, you may limit your ability to receive some or all of our services and/or some features may not be available to you or may not function properly as a result. In the event you do not want your personal information shared, please contact us as provided in Section below (ACCESSING, EDITING, AND REMOVING OF YOUR PERSONAL DATA) with your specific request and within a reasonable time we will review your request with you and/or our customer/your employer, or other appropriate party(ies) based on your relationship with ATTG and/or who you are traveling on behalf of, to assist in resolving the matter.

## **ACTING AS AN AGENT FOR A TRAVEL SERVICE PROVIDER**

When we book and otherwise arrange travel related products and services for you, we usually do so as agent for or on behalf of travel service providers. In this case, we usually collect personal information about you both for our internal purposes as described in this Policy, including the purpose of us processing your booking, and for the travel service provider for whom we act as agent for their internal purposes. As an agent, all bookings are made on your behalf subject to the terms and conditions, including privacy policy, imposed by these travel service providers. We will provide you with copies of all relevant travel service provider terms, conditions and privacy policies upon request.

Accordingly, you are deemed to consent to the collection, use and disclosure of your personal information by us to the relevant travel service providers, and the use and disclosure of your personal information by the relevant travel service providers, for the purposes set out in this Policy and, to the extent permitted under applicable laws, for other purposes specified in their privacy policy.

For example, if you book a flight through us, then under this Policy you consent to us collecting your personal information and disclosing that information to the airline to enable your flight to be booked and

for the airline to provide the flight service to you, and, to the extent permitted under applicable laws, for other purposes specified in their privacy policy.

We act as an agent for or on behalf of travel service providers around the world, so it is not possible for us to set out in this Policy all of the travel service providers for whom we act or their locations.

### **OVERSEAS TRANSFER OF PERSONAL INFORMATION**

We may disclose your personal information to certain overseas recipients, as set out below, which we will do in accordance with applicable laws.

It is possible that information will be transferred to an overseas recipient (other than any of our overseas related entities) located in a jurisdiction where you will not be able to seek redress under applicable laws and that does not have an equivalent level of data protection as in your jurisdiction. To the extent permitted by applicable laws, we will not be liable for how these overseas recipients handle, store and process your personal information. By providing your personal information to us for the purpose of booking and otherwise arranging travel related products and services for you, you consent to our disclosure of your personal information to these overseas recipients for that purpose.

If you have any concerns regarding the transfer of your personal information to a travel service provider, or you wish to contact us for further information, please refer to the "YOUR QUESTIONS" section below.

Atlas Travel & Technology Group ("ATTG") has adopted a Privacy Shield Policy ("Policy") to establish and maintain an adequate level of Personal Data privacy protection. This Policy applies to the processing of Personal Data that ATTG obtains from Customers located in the European Union and Switzerland. Please see Our "Privacy Shield Policy" at [www.primenumberstechnology.com/privacysshield](http://www.primenumberstechnology.com/privacysshield).

### **DISCLOSURES OF YOUR PERSONAL DATA**

In order to carry out the Service outlined above, your Personal Data will be disclosed for the purposes set out above to and shared with appropriate staff in ATTG and our entities and offices. If we would wish to use your Personal Data for a purpose other than that for which they were originally processed, we may only do so if the two purposes are closely related. In performing the Service, we may outsource the processing of certain functions and/or information to third parties.

Please note that whenever we engage with third parties or provide your Personal Data to third party service providers required for the performance of the Service, we oblige such third party to protect your Personal Data with appropriate security measures and prohibit this third party from using your Personal Data for own purposes or from disclosing your Personal Data to others, other than on a need to know basis only. Your Personal Data will not be sold or hired out for commercial purposes.

#### Onward Transfer

Some ATTG products and services are offered in conjunction with a non-affiliated partner or service provider. For example, we outsource the provision of passport and visa services. To provide some of these products and services, the partner or service provider may need to collect and maintain personal information. In these instances, you will be notified before any such data is collected or transferred and may decide not to use that particular service or feature. ATTG will share non-personal identifying and aggregate information (except as described herein) with such partners or service provider in order to administer the co-branded products or services offered.

ATTG will also provide your personal information to one or more GDSs, industry reporting authorities, Internet booking engines, and other travel and related suppliers and vendors as necessary to fulfill your travel arrangements and services. ATTG does not exercise any control over any such parties.

Personal information of job applicants and employees of ATTG and its related companies, affiliates, and subsidiaries will only be transferred in accordance with this Privacy Policy.

At some Internet sites, you can purchase products and services or register to receive materials, such as a brochure, a catalog, or new product and service updates. In many cases, you may be asked to provide contact information such as your name, address, email address, phone number, and credit/debit card information. ATTG has no control over the third parties' use of any personal information you provide when placing such an order. Please exercise care when doing so. Such sites may follow privacy policies that differ from the provisions provided herein. ATTG is not responsible for and expressly disclaims any and all liability related to actions of such linked sites, their privacy policies, or the content of such sites.

### **ACCESSING, EDITING, AND REMOVING OF YOUR PERSONAL DATA**

You may exercise your right to inquire about the Personal Data we maintain about you pursuant to the Service by sending us a written request. However, we may not disclose data that you are not entitled to receive under applicable laws as the case may be. If you become aware of any inaccuracy in the processing of your Personal Data, you may also request that we correct or stop processing Personal Data that we hold about you hereunder by sending us a written request. Any changes will be made within a reasonable time period and in accordance with applicable laws.

### **COOKIES**

#### What Is A Cookie?

A cookie is a small data file sent by our website onto your device (computer, laptop, tablets, cell phones, and other mobile devices). This occurs each time you use said device to visit our website. With the use of cookies, our systems can recognize your device when you return to our website. A cookie does not collect or contain any personal data, but they can store user settings and other information.

Through the browser settings, users can choose to reject all cookies or be alerted when a cookie is sent. However, some functions or services on the site may not be available or may not run properly without cookies.

#### How Long Are Cookies Stored?

Cookies are stored either on the device hard disk (permanent cookie) or in the computer RAM (session cookie).

Permanent cookies are saved on the device and remain so until they are deleted or become invalid. ATTG does not utilize permanent cookies through its website.

Session cookies are generated when a user first visits our website. Session cookies contain a randomly-generated ID number that becomes associated with an individual's device. Session cookies become invalid and are deleted as soon as the user closes the browser.

#### Cookie Functionality

Cookies are used on the ATTG website in various ways relating to site functionality and analysis.

Functional cookies store user settings and ensure the all aspects of the site, including integrated third party services, perform correctly. When users block or delete cookies, portions of the site and/or third party services will not be available.

Statistic cookies are used to understand user behavior in order to improve user experience while visiting ATTG's website. When users block or delete cookies, data cannot be used to improve the user's website experience.

This website uses Google Analytics, a web analysis service provided by Google Inc. Google Analytics uses cookies that enable analysis of the web pages users have visited. The information regarding site use is generally transferred and stored on a Google server located in the USA.

### Managing Cookies on Individual Devices

Users can decide whether or not to allow storage of cookies on their devices. Those who choose to prevent the use of cookies, now or for future sessions, can do so by adjusting browser settings at any time. However, disabling cookies may prevent users from accessing certain areas of the website.

## **SECURITY**

We make every reasonable effort in accordance with industry standard to ensure the integrity and security of our Site, network and linked systems. Nevertheless, we cannot guarantee, ensure or warrant that our security measures will prevent illegal or unauthorized activity in view of your Personal data.

Services and Internet sites we sponsor have security measures in place to protect from the loss, misuse, and unauthorized access, disclosure, destruction, and alteration of personal information under our sole control. We conduct periodic reviews of our data collection, storage, processing, and security measures to ensure we are only collecting, storing, and processing personal information that is required for our services and to fulfill our contractual obligations or for employment matters related to our employees and job applicants.

ATTG currently uses security measures, such as the Secure Sockets Layers (SSL) protocol and firewalls to safeguard personal information. ATTG also implements measures to protect your personal information off-line. Access is restricted to employees who have a "need to know," and those employees must use passwords to access the personal information.

While we make every effort to ensure the integrity and security of our network and systems, we cannot guarantee, ensure, or warrant that our security measures will prevent illegal or unauthorized activity related to your personal information.

If a password is used to help protect your personal information, it is your responsibility to keep your password confidential. Do not share such information with anyone. If you are sharing a computer with anyone you should always choose to log out before leaving a site or service to protect access to your password and personal information from subsequent users.

## Data Integrity

ATTG uses the personal information you provide to us only for the purposes for which you submit such personal information and not in any way that is contrary with the purposes for which it was collected or otherwise stated in this Privacy Policy. We request from you only that personal information which is necessary to provide the services you access or for your employment by ATTG, as applicable, and we will take reasonable steps to ensure that personal information we receive from you is reliable for its intended use, accurate, complete, and current, including providing mechanisms by which you can amend or update your personal information.

## Enforcement

We have established internal procedures to monitor our compliance with the Safe Harbor Program and applicable privacy laws. If you believe that ATTG has not complied with this Privacy Policy with respect to your personal information, you may send your questions and concerns as provided in the section (ACCESSING, EDITING, AND REMOVING OF YOUR PERSONAL DATA) below. Please describe in as much detail as possible the ways in which you believe that the ATTG Privacy Policy has not been complied with. We will investigate your complaint promptly. If your inquiry is not reasonably resolved, ATTG will cooperate with the relevant European Data Protection Authorities to resolve the issue, as applicable.

## Changes to This Privacy Policy

ATTG reserves the right to revise, amend, or modify this Privacy Policy at any time and in any manner. When we post changes to this Privacy Policy, we will update the “last updated” date at the top of this Privacy Policy. By using this site, you consent to the collection and use of your personal information by ATTG in accordance with this Privacy Policy. Your continued use of this site after any changes constitutes your acceptance of any new terms.

## **YOUR QUESTIONS**

If you have questions or concerns about how your personal data that is subject to this Privacy Policy is stored, processed or used, please contact us at: [privacy.policy@atlastravelandtechnology.com](mailto:privacy.policy@atlastravelandtechnology.com)